Grant & Per Diem: Per Diem Payments for Veterans with Minor Dependents Overview VHA Homeless Programs (11HPO)

Overview of the ability to provide GPD per diem payments to Veterans with minor dependents

GPD Provider Website

Relevant Legislation & Regulations

- Public Law (P.L.) 116-315; Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020
- 38 CFR § 61; Department of Veterans Affairs, Homeless Veterans, Final Rule
- <u>2 CFR § 200</u>; Office of Management and Budget Guidance, Uniform Administrative Requirements, Cost Principles, and Audits Requirements for Federal Awards

Background & Definition of a Minor Dependent

In January 2021, P.L. 116-315, *Johnny Isakson and David P. Roe, M.D. Veterans Health Care and Benefits Improvement Act of 2020*, was signed into law. Part of its provisions allowed for GPD grantees to pay supplemental per diem for Veterans who have care of the minor dependents and are enrolled in GPD services. In addition to the per diem paid for the daily care of the Veteran, an amount that equals **50 percent of daily cost of care** may be paid for a Veteran who has care of minor dependents. In other words, grantees may bill an additional 50% of the approved per diem rate per each minor dependent. More information is available on the <u>GPD Provider Website</u>.

The GPD office currently defines minor dependents as someone who is unmarried, is a member of the Veteran's household, and is under age 22 or is age 22 or over and was considered permanently incapable of self-support before reaching the age of 22. Definitions and rules may change when regulations are formalized.

How to Request Per Diem for Veterans with Minor Dependents

The GPD Office asks interested grantees to submit their plan to provide care to minor dependents through the **change of scope process**. Additionally, our office is asking that a **supplemental checklist** must accompany the change of scope, as well as a signed memo from the VA Medical Center director, both available on the GPD Provider Website.

Who May Request Per Diem for Veterans with Minor Dependents?

At this time, any grantee with an active per diem only/Transition in Place grant award may request per diem to serve minor dependents. It is critical that any grantee wishing to pursue this thoroughly review the minor dependent change of scope checklist and thoroughly answer all of its questions. Our office, in part, will review the grantee's capacity to serve children and their experience to date. Grantees are encouraged to coordinate with their VA Medical Center GPD liaisons, and the VAMC director must concur with the grantee's request. Please refer to our GPD Provider Website for sample materials.

Impact on Number of Beds/Grant Awards & Billing

Of note, serving Veterans with minor dependents will not increase the number of authorized beds under the current GPD award. To reduce any potential impact on an agency's capacity to serve homeless Veterans in GPD grantees operating at full capacity may bill for up to five beds beyond their authorized grant award for minor dependents in the care of a Veteran in the GPD unit. For example, a grantee with a grant award for 40 GPD beds operating at 100% occupancy may bill for up to five additional minor dependents at 50% of the current per diem rate without prior approval from the GPD National Office. Billing for more than five beds for minor dependents above the authorized bed numbers in the award will require written authorization from the GPD National Office.

Grantees serving minor dependents four or more days in a week may bill for seven days of minor dependent services. Grantees serving minor dependents three or fewer days in a week must bill for the exact number of nights the minor dependent(s) sleep at the GPD facility. A week is currently defined as Sunday – Saturday. Grantees must continue to provide a detailed daily census to support billing.

Allowable costs for minors will follow our existing GPD regulations and guidance, as long as it falls within the scope of services. These should also be deemed reasonable costs for the care and services of minor dependents.

Compliance

Standard expectations of grant compliance remain. Grantees are reminded to have internal controls (2 CFR § 200.303) and written procedures to operationalize and implement the provision of services to Veterans who have care of minor dependents. Internal operating procedures should demonstrate awareness of and compliance with other requirements such as applicable state and local requirements. GPD liaisons will be expected to incorporate assessments of minor dependent care in their **regular environment of care reviews**. Minor dependents of Veterans do not need to be entered into HOMES

Technical Assistance

Providing per diem payment for Veterans who have care of minor dependents is a **new authority for GPD**. Additional technical assistance will be forthcoming. In the interim, high-level coordination between grantees and VA Medical Centers is encouraged upfront. You may send questions to GPDGrants@va.gov.

Additional Contact Information

GPD Resources

- Questions: GPDGrants@va.gov
- Minor Dependents Change of Scope Checklist and Sample VAMC Director's Memo are available on the GPD Provider Website: https://www.va.gov/HOMELESS/GPD_ProviderWebsite.asp